



Department of Toxic Substances Control

M60050.002371
MCAS EL TORO
SSIC #5090.3



Jesse R. Huff, Director
5796 Corporate Avenue
Cypress, California 90630

January 22, 1999

Winston H. Hickox
Secretary for
Environmental
Protection

Gray Davis
Governor

Mr. Joseph Joyce
BRAC Environmental Coordinator
U.S. Marine Corps Air Station - El Toro
AC/S, Environmental (1AU), BRAC Building #899
P. O. Box 95001
Santa Ana, California 92709-5001

Dear Mr. Joyce:

COMMENTS ON DRAFT PROPOSED PLAN FOR GROUNDWATER REMEDIATION, OPERABLE UNIT (OU) 2A SITE 24 AND OU-1 SITE 18, MARINE CORPS AIR STATION (MCAS) EL TORO

The Department of Toxic Substances Control (DTSC) has completed the review of the above subject document dated November 1998. The document describes the alternatives for cleanup of contaminated groundwater at Site 18, the Regional Groundwater Plume and Site 24, the volatile organic compounds (VOC) source area at MCAS El Toro. The Proposed Plan (PP) identifies Enhanced Alternative 8 for remediation of the principal aquifer at Site 18 and a variation of Alternative 10B' for remediation of the shallow groundwater unit at Site 24 as the preferred remedy. Also, soil vapor extraction will be used to remediate soil at Site 24.

DTSC comments are as follows:

1. DTSC concurs with the Marine's proposed selection of Enhanced Alternative 8 and Alternative 10B' for groundwater and soil vapor extraction for soil remediation. However, a final decision on the selected remedy will be made after comments are received from the public.
2. Page 1, second column, first paragraph - Please revise the last sentence to read as follows: "Prevent domestic use of groundwater containing VOCs above cleanup levels until it is cleaned."
3. Page 4 & 5, What the Remedial Investigation Found - Provide the estimated quantities of TCE and the highest concentrations detected in the groundwater. This will give the reader an idea of how much contamination exists on and off Station.

Mr. Joseph Joyce
January 22, 1999
Page 2

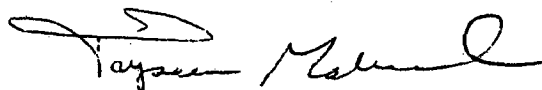
4. Page 12, third paragraph - Please revise the last sentence to indicate the operational testing of the treatment system began in January 1999.
5. Page 13, The Marine's Preferred Remedy - Groundwater from the shallow groundwater unit which has high concentrations of VOCs will go through VOC "Pretreatment" before it is blended with the deep aquifer groundwater that has low concentrations of VOCs. Also, we understand that the blended shallow and deep groundwater VOC treatment takes place after TDS and nitrates are treated in the Irvine Desalter Project. Please revise the diagram to also show the VOC treatment after the IDP.

DTSC considers the "Pretreatment" as part of the treatment process and the CERCLA remedy. You may consider it as Phase I of the treatment train because it is a truly VOC treatment and disposal of a groundwater CERCLA waste. Also, this treatment must comply with the Applicable or Relevant and Appropriate Requirements. The design and other relevant documents must be submitted to the regulatory agencies for review and approval. Please delete reference to "Pretreatment" not being a CERCLA remedy.

For additional comments on the document, please see the enclosed comments from Ms. Marsha Mingay, our Public Participation Specialist.

If you have any questions, please call me at (714) 484-5418.

Sincerely,



Tayseer Mahmoud
Remedial Project Manager
Office of Military Facilities
Southern California Operations

Enclosure

cc: Mr. Glenn Kistner
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Mr. Joseph Joyce
January 22, 1999
Page 3

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